

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Located in Baltimore**

IN RE

Herdisene McIntyre Green

Case No. **15-15219**
Chapter 13

Debtor

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW, NATIONSTAR MORTGAGE LLC by Counsel, and for its Objection to Confirmation of the Chapter 13 Plan filed by the debtor states as follows:

1. The bank is a secured creditor of the debtor pursuant to a Deed of Trust dated November 22, 2006 which secures a Mortgage Note to real property of the Debtors located at 3423 Ripple Road Windsor Mill MD 21244.
2. As of the date of filing, the lender was owed approximately \$187,823.90 of which \$76,883.98 are the pre-petition arrearage.
3. The Debtor's Plan proposes to pay a total of \$0.00 for the pre-petition arrearage.
4. The Plan does not comply with 11 U.S.C. Section 1325, in that it does not pay the Movant, its pre-petition arrearage claim.

WHEREFORE, the Movant respectfully requests that Confirmation of the Chapter 13 Plan submitted by the Debtors herein be denied, and for any other relief the Court deems necessary.

Respectfully Submitted,

ROSENBERG & ASSOCIATES, LLC

/s/ Mark D. Meyer

Mark D. Meyer, #15070
7910 Woodmont Avenue, Suite 750
Bethesda, Maryland 20814
(301) 907-8000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on Wednesday, May 06, 2015 a copy of the foregoing Objection to Plan was served via first class postage prepaid, or electronic email, to the following:

Nancy Spencer Grigsby, Trustee
4201 Mitchellville Road
Suite 401
Bowie, MD 20716

Herdisene McIntyre Green
3423 Ripple Rd
Baltimore, MD 21224

/s/ Mark D. Meyer
Mark D. Meyer